

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Elizabeth Silver

No. 08-CV-6522

Plaintiff,

v.

**MOTION TO ADMIT
COUNSEL PRO HAC VICE**

Mario Hermando Lavandeira, Jr., a/k/a Mario
Lavandeira, a/k/a Perez Hilton

Defendant.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Jeffrey M. Eilender, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

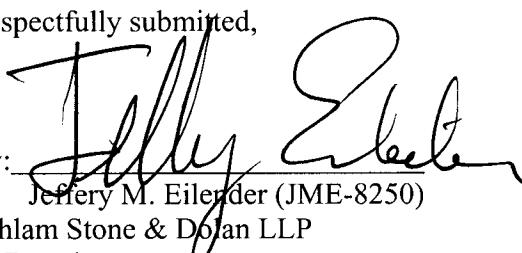
Applicant's Name: Bryan J. Freedman, Esq.
Firm Name: Freedman & Taitelman, LLP
Address: 1901 Avenue of the Stars, Suite 500
City/State/Zip: Los Angeles, California 90067
Phone No.: (310) 201-0005
Fax No.: (310) 201-0045

Mr. Freedman is a member in good standing of the Bar of the State of California. There are no disciplinary proceedings pending against Mr. Freedman in any State or Federal Court.

Dated: New York, New York
August 8, 2008

Respectfully submitted,

By:


Jeffrey M. Eilender (JME-8250)
Schlam Stone & Dolan LLP
26 Broadway
New York, New York 10004
(212) 344-5400
(212) 344-7677 (facsimile)

AUG 07 2008
JME-8250-652242

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Elizabeth Silver	:
Plaintiff,	: DECLARATION OF JEFFREY M. EILENDER IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE
v.	:
Mario Hermando Lavandeira, Jr., a/k/a Mario Lavandeira, a/k/a Perez Hilton	:
Defendant.	:

JEFFREY M. EILENDER, declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am a member of the law firm of Schlam Stone & Dolan LLP, counsel for defendant Mario Hermando Lavandeira, Jr., a/k/a Mario Lavandeira, a/k/a Perez Hilton (“Perez Hilton”) in the above-captioned matter. I am familiar with the proceedings in this case. I make this declaration based on the information provided to me in connection with this action and in support of the accompanying motion to admit Bryan J. Freedman, Esquire as counsel pro hac vice to represent Defendant Perez Hilton in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in New York in 1992. I am also admitted to the bars of the United States District Courts for the Southern and Eastern Districts of New York and the United States Court of Appeals for the Second Circuit, and am in good standing with these Courts.

3. Mr. Freedman is well able to represent Defendant Perez Hilton in this matter. He has more than fourteen years experience in federal practice and is familiar with the Federal Rules of Procedure. Mr. Freedman is also representing Mr. Hilton in the matter of *Lavandeira, d/b/a Perez Hilton v. Infuse, LLC et al.*, an action filed on July 21, 2008, in the United States District Court Central District of California, Case No. CV 08-04764 by Mr. Hilton against this plaintiff –

Elizabeth Silver – and others. That pending lawsuit raises claims related to those asserted in this action. Mr. Hilton has confidence in the abilities of Mr. Freedman and wishes to be represented by him in this matter.

4. Mr. Freedman is a member of the law firm Freedman & Taitelman, LLP in Los Angeles, California. He is a member in good standing of the Bar of the State of California. Attached hereto as Exhibit 1 is the certificate of good standing for Mr. Freedman issued by the Supreme Court of California.

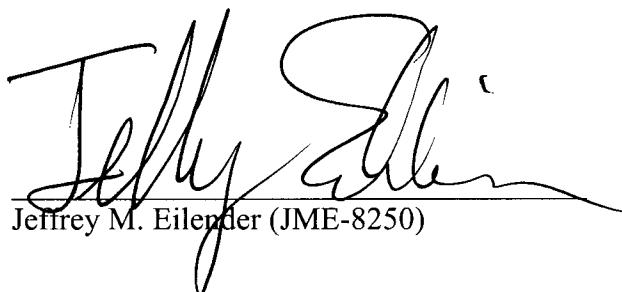
5. Accordingly, I am pleased to move the admission of Bryan J. Freedman, pro hac vice.

6. I respectfully submit a proposed order granting the admission of Bryan J. Freedman, pro hac vice, which is attached hereto as Exhibit 2.

7. I declare under penalty of perjury that the foregoing is true and correct.

WHEREFORE, it is respectfully requested that the motion to admit Bryan J. Freedman, pro hac vice, to represent Defendant Perez Hilton in the above captioned matter, be granted.

Executed on August 8, 2008



The image shows a handwritten signature in black ink, appearing to read "Jeffrey M. Eilender". Below the signature, the name "Jeffrey M. Eilender" is printed in a smaller, sans-serif font, followed by the identifier "(JME-8250)".



**THE STATE BAR
OF CALIFORNIA**

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

July 31, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, BRYAN JOEL FREEDMAN, #151990 was admitted to the practice of law in this state by the Supreme Court of California on February 8, 1991; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature of Kath Lambert.

Kath Lambert
Custodian of Membership Records

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

TAMAR LUSZTIG, being duly sworn, deposes and states:

I am over 18 years of age, I am not a party to the within action, and I reside in Queens, New York.

On August 6, 2008, I served true and complete copies of the **MOTION TO ADMIT COUNSEL PRO HAC** with **DECLARATION OF JEFFREY M. EILENDER IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE** and **ORDER FOR ADMISSION PRO HAC VICE** upon:

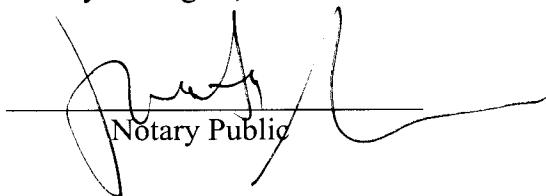
ELIZABETH A. SILVER
10 Ferncliff Terrace
Short Hills, New Jersey 07078

by placing the above mentioned documents in a postage paid, sealed **FEDERAL EXPRESS-NEXT BUSINESS DAY PRIORITY DELIVERY** envelope and depositing the envelope into a **FEDERAL EXPRESS** mail depository, causing above mentioned documents to be delivered to the above-named persons at the above listed addresses, overnight – next business day mail.



TAMAR LUSZTIG

Sworn to before me this
6th day of August, 2008



Notary Public

JONATHAN MAZER
Notary Public, State of New York
No. 02MA5037040
Qualified in New York County
Commission Expires Dec. 12, 2010

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Elizabeth Silver

Plaintiff,

-against-

Mario Hermando Lavandeira, Jr., a/k/a
Mario Lavanderia, a/k/a Perez Hilton

Defendant.

Case No. 08 CV 6522 (JSR)

MOTION TO ADMIT PRO HAC VICE

SCHLAM STONE & DOLAN LLP

Jeffrey M. Eilender

Hillary S. Zilz

26 Broadway

New York, NY 10004

(212) 344-5400 (telephone)

(212) 344-7677 (facsimile)

*Attorneys for Defendant Mario Hermando Lavandeira, a/k/a Mario Lavanderia
a/k/a Perez Hilton*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Elizabeth Silver	:	No. 08-CV-6522
Plaintiff,	:	
v.	:	ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION
Mario Hermando Lavandeira, Jr., a/k/a Mario Lavandeira, a/k/a Perez Hilton	:	
Defendant.	:	

Upon the motion of Jeffrey M. Eilender, attorney for Defendant Mario Hermando Lavandeira, Jr., a/k/a Mario Lavandeira, a/k/a Perez Hilton (“Perez Hilton”), and said sponsor’s declaration in support:

IT IS HEREBY ORDERED that

Applicant’s Name: Bryan J. Freedman, Esq.
Firm Name: Freedman & Taitelman, LLP
Address: 1901 Avenue of the Stars, Suite 500
City/State/Zip: Los Angeles, California 90067
Telephone/Fax: (310) 201-0005/(310) 201-0045
Email: bfreedman@ftllp.com

is admitted pro hac vice as counsel for Defendant Perez Hilton in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of this Court.

Dated: August 6, 2008
New York, New York

United States District Judge

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

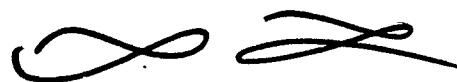
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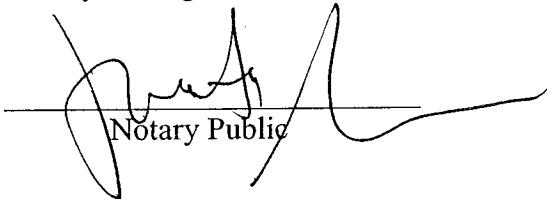
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TAMAR LUSZTIG

Sworn to before me this
6th day of August, 2008



Notary Public

JONATHAN MAZER
Notary Public, State of New York
No. 02MA5037040
Qualified in New York County
Commission Expires Dec. 12,

